

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**vs.**

**THERESA ATENCIO,  
Defendant.**

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**CAUSE NO. 1: 24-CR-1493-MLG**

**MOTION FOR MODIFICATION OF PRE-TRIAL RELEASE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Comes now Defendant Theresa Atencio, and files this, her Motion for Modification of Pre-Trial Release and respectfully shows the Court as follows:

On November 19, 2024, the Grand Jury returned its Indictment, charging Defendant with Conspiracy, Attempt to Provide a Prohibited Object to an Inmate of a Prison; Aiding and Abetting, Attempt by an Inmate of a Prison to Obtain a Prohibited Object; Aiding and Abetting. ECF No. 45.

Defendant's PreTrial Release conditions restrict her from travelling outside of the Northern District of New Mexico, or to a foreign country without the permission of the court.

Defendant respectfully requests permission to travel to Los Angeles, California, from April 23, 2025, through April 28, 2025, in order to attend a medical appointment at Cedars-Sinai Medical Center located at 8635 W 3rd Street, Suite 990W, Los Angeles, California 90048. She has a new patient appointment scheduled for April 24, 2025, at 10:45 A.M. The purpose of the appointment is to determine whether she requires surgery. Due to her travel limitations, the medical team has indicated they will attempt to schedule the surgery for the following day if necessary.

Defendant has fully complied with all pretrial release conditions and will continue to do so. She will provide pretrial services with a complete itinerary, including travel and lodging details, and will maintain all necessary contact with supervising authorities.

Granting this request will not prejudice the interests of justice, as Defendant has demonstrated responsibility in adhering to her release conditions. This temporary modification is a reasonable and necessary accommodation for an unavoidable personal matter.

Counsel for Defendant conferred with PreTrial Services Officer Beatrice Manzanares, who is unopposed to this request.

Counsel for Defendant also conferred with Assistant United States Attorney David Hirsch, who is unopposed to this request.

Wherefore premises considered, Defendant respectfully requests that the Court grant the foregoing Motion and modify her Pre-Trial Release. Defendant respectfully requests that this Court temporarily modify the conditions of pretrial release to permit travel to Los Angeles, California on April 23, 2025, and return on April 28, 2025. Defendant also prays for all other relief to which she is entitled in both equity and law.

Respectfully submitted,

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By: /s/ Felix Valenzuela  
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Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that, on April 14, 2025, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which shall send notification of such filing to all parties.

/s/ Felix Valenzuela

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**ORDER**

On this day, the Court considered Defendant's Motion for Modification of Pre-Trial Release filed in the above-captioned cause. After due consideration, the Court is of the opinion that the Motion should be granted.

Accordingly, **IT IS ORDERED** that Defendant's Motion for Modification of Pre-Trial Release is **GRANTED**.

**IT IS THEREFORE ORDERED** that Defendant is permitted to travel to Los Angeles, California, on April 23, 2025, and return on April 28, 2025.

**SIGNED** this \_\_\_\_ day of \_\_\_\_\_, 2025.

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**MATTHEW L. GARCIA**  
**UNITED STATES DISTRICT JUDGE**